DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814



October 26,	1998
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ALL-COUNTY LETTER NO. 98-84

TO: ALL COUNTY WELFARE DIRECTORS ALL FOOD STAMP COORDINATORS

	REASON FOR THIS TRANSMITTAL
[]	State Law Change Federal Law or Regulation Change Court Order or Settlement Agreement
	Court Order or Settlement Agreement Clarification Requested by One or More Counties
[X]	Initiated by CDSS

SUBJECT: FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM PLAN FFY 1999

The purpose of this letter is to inform counties of the Food Stamp Employment and Training (FSET) planning process for Federal Fiscal Year (FFY) 1999. Please complete the enclosed county FSET plan and provide all pertinent data.

The plan follows the United States Department of Agriculture (USDA), Food and Nutrition Service (FNS) requirement for plan format and meets all existing plan requirements. The plan simplifies the county planning process by providing a detailed fill-in and check box plan format with space available for comments and/or explanation. While it may appear there is some duplication in the plan, all items are required in order to obtain federal approval.

Counties operating a program should complete all pertinent sections of the Handbook on Preparing County Plans for Food Stamp Employment and Training Programs (enclosed), and include any additional comments in designated sections or attach narrative as necessary. Counties not participating in FSET this year need only complete Tables 1 and 1A. Each county will need to complete the plan as it pertains to the county and submit it by **December 1, 1998**.

In developing their plans, counties should take into account the work requirements which were established by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996. In order to remain eligible for food stamps, non-exempt able-bodied adults without dependents (ABAWDs) are required to work 20 hours per week, participate in workfare or participate in an FSET activity for 20 hours per week. Job club/job search, as a stand alone component, does not count toward meeting the 20-hour work requirement.

Counties may continue to combine elements of traditional components with drug and alcohol rehabilitation. Such activities are only allowable if they are not considered "medical," i.e., a course(s) of treatment provided by licensed physicians, psychologists, etc., intended to treat a diagnosed condition. Instead, they must provide social and support services (discussion groups, general counseling, etc.) that can be directly linked to advancing an FSET participant's employment opportunities. If such activities are medical in nature, as defined above, they would likely be considered good cause for an exemption from work requirements. Such activities must

constitute only a minor portion of a component. For example, a county could require a maximum of one to five hours of participation in drug rehabilitation per week with the balance of the 20-hour requirement being met by attending a qualifying work activity.

The Balanced Budget Act (BBA) of 1997 permits states to exempt 15 percent of its ABAWD population that is in danger of losing food stamp eligibility for not meeting the work requirement. Each county agency may apply this exemption as it deems appropriate. Counties may determine the most efficient and effective manner in which to use the exemption. Attachment I indicates the number of additional exemptions counties can use each month. The criteria counties use to allocate the additional exemptions must be described in the plan.

Funding for the FSET Program

USDA provided California with \$10,520,124 in regular unmatched funding, and \$3,887,054 in supplemental unmatched funding. Expenditures beyond the regular funding and participant reimbursement is matched by federal and state participation. Each participating county's FFY 1999 grant is based on its share of the statewide non-assistance food stamp caseload. Only counties which intend to satisfy their maintenance of effort (MOE) requirement in accordance with section 16(1)(F) of the Food Stamp Act may spend the supplemental funding.

Attachment II lists each county's 100 percent program allocation grant, the participant reimbursement allocation for transportation and dependent care, and the MOE. These funding ratios are based on the availability of federal and state funds.

The BBA requires that at least **80 percent** of all unmatched FSET expenditures be used to serve ABAWDs in qualifying ABAWD activities i.e., a workfare program or an allowable 20-hour per week work/training program. Expenditures for non-qualifying components, such as job club, that exceed **20 percent** of a county's FSET expenditures will be matched at the 50 percent federal, 50 percent county rate.

FSET Program expenditures in excess of the 100 percent allocation and the 50 percent federal/35 percent state/15 percent county allocation are funded, at county option, 50 percent federal/50 percent county funds. All fund requests must be identified in the county plan. To the extent that proposed services are consistent with state regulations, requests will be forwarded to FNS for approval as part of the State Plan. Final allocations will be issued when FNS approves the State Plan. The final allocation will be based on the request each county makes as part of the planning process and the availability of state and federal funds.

The BBA requires monitoring of state expenditures for Federal Employment and Training funding. Effective October 1, 1998, USDA implemented a reimbursement rate for individual components. The rates are to ensure that the money counties spend creating workfare slots and 20-hour-a-week education and training opportunities for ABAWDs reflects the reasonable cost of

efficiently and economically providing those activities. The rates will provide a ceiling of what FNS estimates to be the reasonable maximum cost of providing the work opportunities.

FNS is establishing one reimbursement rate for both workfare and 20-hour a week education and training components. Recognizing the uncertain level of compliance with various work requirements among the ABAWD population, FNS is setting two levels for the reimbursement rate—one level for filled work slots and the other for unfilled or "offered" work slots. A slot is "filled" when a participant reports to a work or training site to begin his or her work activities and each month they remain in that activity. A slot is "offered" when a bona fide workfare or training opportunity is made available to a participant (i.e., the participant is told to report to a work site at a given date and time) but the participant either refuses the assignment or does not report. In the case of self-directed workfare programs FNS will reimburse counties only for filled slots.

The rates established for FFY 1999 are the following:

Offered work Slot: \$30

Filled Work slots: \$175

FNS will sum the number of filled and unfilled slots a county reports and multiply each by the appropriate rate. FNS will add the two resulting sums and compare that against the county's actual expenditure of Federal FFY 1999 E&T money. If the amount spent is less than the amount allowed under the rates, the county will be required to pay that excess amount out of their own funds (which would be eligible for the standard 50 percent Federal match).

If you have any questions, please have your staff contact Tony Pyara at (916) 657-2630. Questions concerning your allocation should be directed to the County Cost Analysis Bureau at (916) 657-3806.

Sincerely,

Original Document Signed By Bruce Wagstaff on 10/26/98

BRUCE WAGSTAFF
Deputy Director
Welfare to Work Division

Enclosures

c: CWDA CSAC

ABAWD Exemptions provided by Program 9/30/98

COUNTIES	NAFS Caseload 7/97 - 6/98	% to Total	Additional 15% ABAWD Exemptions 11,560
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ALAMEDA	171,832	0.032970	381
ALPINE	315	0.000060	1
AMADOR	4,828	0.000926	11
BUTTE	55,415	0.010633	123
CALAVERAS	9,841	0.001888	22
COLUSA	5,625	0.001079	12
CONTRA COSTA	93,051	0.017854	206
DEL NORTE	10,334	0.001983	23
EL DORADO	19,547	0.003751	43
FRESNO	170,773	0.032767	379
GLENN	5,587	0.001072	12
HUMBOLDT	43,870	0.008418	97
IMPERIAL	42,764	0.008205	95
INYO	5,647	0.001084	13
KERN	185,441	0.035582	411
KINGS	38,732	0.007432	86
LAKE	20,214	0.003879	45
LASSEN	8,079	0.001550	18
LOS ANGELES	1,769,536	0.339532	3,925
MADERA	41,694	0.008000	92
MARIN	20,206	0.003877	45
MARIPOSA	4,795	0.000920	11
MENDOCINO	28,857	0.005537	64
MERCED	73,503	0.014103	163
MODOC	1,831	0.000351	4
MONO	1,888	0.000362	4
MONTEREY	51,371	0.009857	114
NAPA	13,198	0.002532	29
NEVADA	11,435	0.002194	25
ORANGE	193,487	0.037126	429
PLACER	20,536	0.003940	46
PLUMAS	3,737	0.000717	8
RIVERSIDE	175,865	0.033744	390
SACRAMENTO	229,036	0.043947	508
SAN BENITO	6,128	0.001176	14
SAN BERNARDINO	302,421	0.058027	671
SAN DIEGO	246,004	0.047202	546
SAN FRANCISCO	218,017	0.041832	484
SAN JOAQUIN	120,637	0.023147	268
SAN LUIS OBISPO	23,078	0.004428	51
SAN MATEO	26,122	0.005012	58
SANTA BARBARA	53,631	0.010291	119
SANTA CLARA	129,993	0.024943	288
SANTA CRUZ	33,707	0.006468	75
SHASTA	58,073	0.011143	129
SIERRA	599	0.000115	1
SISKIYOU	11,545	0.002215	26
SOLANO	43,239	0.008297	96
SONOMA	38,628	0.007412	86
STANSLAUS	77,313	0.014835	171
SUTTER	16,090	0.003087	36
TEHAMA	20,526	0.003938	46
TRINITY	1,291	0.000248	3
TULARE	101,508	0.019477	225
TUOLUMNE	13,385	0.002568	30
VENTURA	79,752	0.015303	177
YOLO	25,303	0.004855	56
YUBA	31,834	0.004033	71
TOTAL	5,211,694	1.000000	11,560
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FSET PLANNING ALLOCATION FY 1998/99 (FFY 1999) NAFS CASELOAD (INTAKE & CONTINUING) ALL COUNTIES PARTICIPATING IN PROGRAM

50% Fed / 50% Co funds not included in this planning allocation.

PROGRAM ALLOCATION 100% Federal Grant:

	PROGRAM ALLOCATION							
1			100% Federal G	% Federal Grant: NORMAL 50/35/15 with State Cap (MC			(MOE)	
			Distribution of	Distribution of	FEDERAL	STATE	COUNTY	
	NAFS Caseload	% to Total	1st Component *	2nd Component	MOE MATCH	MOE	MOE	
COUNTIES	7/97 - 6/98		\$9,685,124	\$3,887,054	\$3,947,692	\$560,000	\$3,387,692	
			40,000,000	4 0,001,001	40,011,000	*****	* 0,001,000	
ALAMEDA	171.832	0.035205	\$340,967	\$136,845	\$138,980	\$19,715	\$119,265	
ALPINE	0	0.000000	\$0	\$0	\$0	\$0	\$0	
AMADOR	0	0.000000	\$0	\$0	\$0	\$0	\$0	
BUTTE	55,415	0.011354	\$109,960	\$44,132	\$44,820	\$6,358	\$38,462	
CALAVERAS	0	0.000000	\$0	\$0	\$0	\$0	\$0	
COLUSA	0	0.000000	\$0	\$0	\$0	\$0	\$0	
CONTRA COSTA	93,051	0.019064	\$184,642	\$74,105	\$75,261	\$10.676	\$64,585	
DEL NORTE	10,334	0.002117	\$20,506	\$8,230	\$8,358	\$1,186	\$7.172	
EL DORADO	19,547	0.004005	\$38,787	\$15,567	\$15,810	\$2.243	\$13,567	
FRESNO	170,773	0.034988	\$338,866	\$136,001	\$138,123	\$19,593	\$118,530	
GLENN	5,587	0.001145	\$11,086	\$4,449	\$4,518	\$641	\$3,877	
HUMBOLDT	43,870	0.008988	\$87,051	\$34,937	\$35,482	\$5,033	\$30,449	
IMPERIAL	0	0.000000	\$0	\$0	\$0	\$0	\$0	
INYO	0	0.000000	\$0	\$0	\$0	\$0	\$0	
KERN	185,441	0.037993	\$367,972	\$147,683	\$149,987	\$21,276	\$128,711	
KINGS	0	0.000000	\$307,972	\$147,083	\$149,987	\$0	\$120,711	
LAKE	0	0.000000	\$0	\$0	\$0	\$0	\$0 \$0	
LASSEN	0	0.000000	\$0	\$0	\$0	\$0	\$0 \$0	
LOS ANGELES	1,769,536	0.362546	\$3,511,300	\$1,409,234	\$1,431,219	\$203.028	\$1,228,191	
MADERA	1,769,536	0.000000	\$3,511,300	\$1,409,234	\$1,431,219	\$203,028	\$1,220,191	
MARIN	20,206	0.000000	\$40,095	\$16,092	\$16,343	\$2,318	\$14,025	
MARIPOSA				. ,				
	4,795	0.000982	\$9,515	\$3,819	\$3,879	\$550	\$3,329	
MENDOCINO	28,857	0.005912	\$57,261	\$22,981	\$23,340	\$3,311	\$20,029	
MERCED	73,503	0.015059	\$145,852	\$58,537	\$59,450	\$8,433	\$51,017	
MODOC	0	0.000000	\$0	\$0	\$0	\$0	\$0	
MONO	0	0.000000	\$0	\$0	\$0	\$0	\$0	
MONTEREY	51,371	0.010525	\$101,936	\$40,911	\$41,549	\$5,894	\$35,655	
NAPA	13,198	0.002704	\$26,189	\$10,511	\$10,675	\$1,514	\$9,161	
NEVADA	0	0.000000	\$0	\$0	\$0	\$0	\$0	
ORANGE	193,487	0.039642	\$383,937	\$154,090	\$156,494	\$22,199	\$134,295	
PLACER	20,536	0.004207	\$40,750	\$16,355	\$16,610	\$2,356	\$14,254	
PLUMAS	3,737	0.000766	\$7,415	\$2,976	\$3,022	\$429	\$2,593	
RIVERSIDE	175,865	0.036032	\$348,970	\$140,057	\$142,242	\$20,178	\$122,064	
SACRAMENTO	229,036	0.046925	\$454,477	\$182,401	\$185,246	\$26,278	\$158,968	
SAN BENITO	6,128	0.001256	\$12,160	\$4,880	\$4,956	\$703	\$4,253	
SAN BERNARDINO	302,421	0.061961	\$600,096	\$240,844	\$244,601	\$34,698	\$209,903	
SAN DIEGO	246,004	0.050402	\$488,147	\$195,914	\$198,970	\$28,225	\$170,745	
SAN FRANCISCO	218,017	0.044668	\$432,612	\$173,626	\$176,335	\$25,014	\$151,321	
SAN JOAQUIN	120,637	0.024716	\$239,381	\$96,074	\$97,573	\$13,841	\$83,732	
SAN LUIS OBISPO	23,078	0.004728	\$45,794	\$18,379	\$18,666	\$2,648	\$16,018	
SAN MATEO	26,122	0.005352	\$51,834	\$20,803	\$21,128	\$2,997	\$18,131	
SANTA BARBARA	0	0.000000	\$0	\$0	\$0	\$0	\$0	
SANTA CLARA	129,993	0.026633	\$257,946	\$103,525	\$105,140	\$14,915	\$90,225	
SANTA CRUZ	0	0.000000	\$0		\$0	\$0	\$0	
SHASTA	58,073	0.011898	\$115,235	\$46,249	\$46,970	\$6,663	\$40,307	
SIERRA	0	0.000000	\$0	\$0	\$0	\$0	\$0	
SISKIYOU	11,545	0.002365	\$22,909	\$9,194	\$9,337	\$1,325	\$8,012	
SOLANO	43,239	0.008859	\$85,799	\$34,435	\$34,972	\$4,961	\$30,011	
SONOMA	38,628	0.007914	\$76,650	\$30,763	\$31,243	\$4,432	\$26,811	
STANSLAUS	77,313	0.015840	\$153,413	\$61,571	\$62,532	\$8,870	\$53,662	
SUTTER	0	0.000000	\$0	\$0	\$0	\$0	\$0	
TEHAMA	0	0.000000	\$0	\$0	\$0	\$0	\$0	
TRINITY	1,291	0.000265	\$2,562	\$1,028	\$1,044	\$148	\$896	
TULARE	101,508	0.020797	\$201,423	\$80,840	\$82,101	\$11,646	\$70,455	
TUOLUMNE	0	0.000000	\$0	\$0	\$0	\$0	\$0	
VENTURA	79,752	0.016340	\$158,252	\$63,513	\$64,504	\$9,150	\$55,354	
YOLO	25,303	0.005184	\$50,209	\$20,151	\$20,465	\$2,903	\$17,562	
YUBA	31,834	0.006522	\$63,168	\$25,352	\$25,747	\$3,652	\$22,095	
TOTAL	4,880,863	1.000000	\$9,685,124	\$3,887,054	\$3,947,692	\$560,000	\$3,387,692	
				ss \$275,000 State				

* \$10,520,124 less \$275,000 State Ops, less \$560,000 Worker's Comp

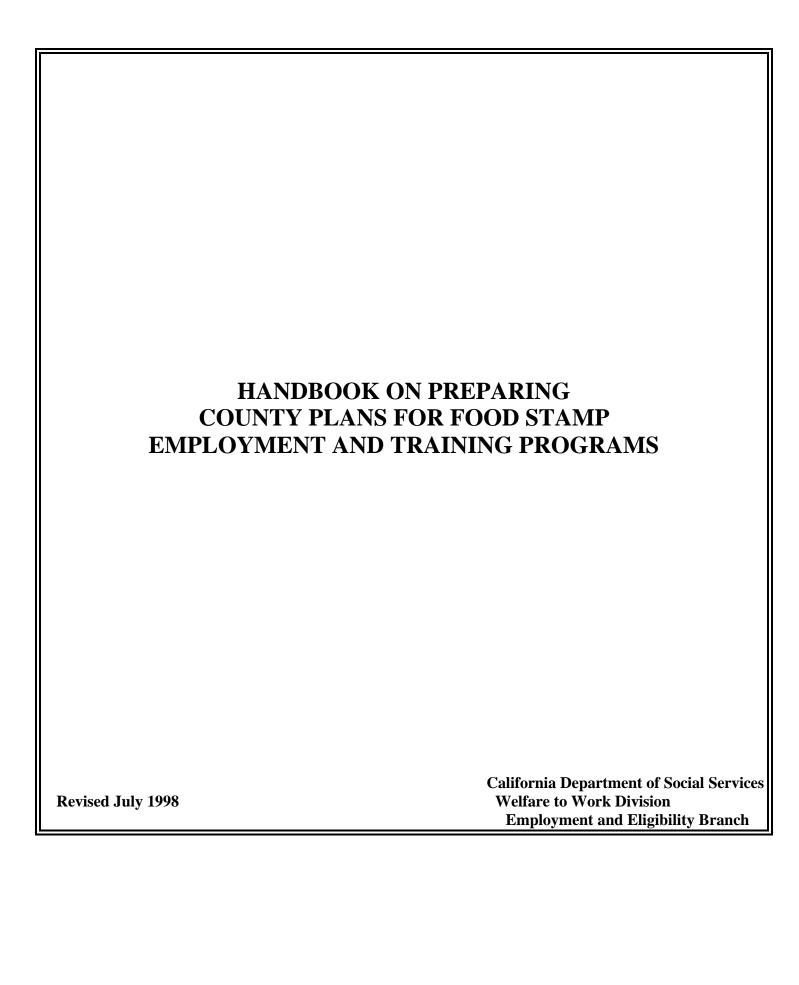
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FSET PLANNING ALLOCATION FY 1998/99 (FFY 1999) NAFS CASELOAD (INTAKE & CONTINUING) SPECIFIC COUNTIES PARTICIPATING IN PROGRAM

PARTICIPANT REIMBURSEMENT ALLOCATION Participant Reimbursement Funds 50/35/15:

Participant Reimbursement Funds 50/35/15:						
	FEDERAL	STATE SHARE	COUNTY	Total Distribution of		
	SHARE	Cap Amount	SHARE	50/35/15%		
COUNTIES	\$1,124,286	\$787,000	\$337,285	\$2,248,571		
ALAMEDA	\$39,581	\$27,707	\$11,874	\$79,162		
ALPINE	\$0	\$0	\$0	\$0		
AMADOR	\$0	\$0	\$0	\$0		
BUTTE	\$12,765	\$8,935	\$3,829	\$25,529		
CALAVERAS	\$0	\$0	\$0	\$0		
COLUSA	\$0	\$0	\$0	\$0		
CONTRA COSTA	\$21,434	\$15,004	\$6,430	\$42,868		
DEL NORTE	\$2,380	\$1,666	\$715	\$4,761		
EL DORADO	\$4,503	\$3,152	\$1,350	\$9,005		
FRESNO	\$39,337	\$27,536	\$11,801	\$78,674		
GLENN	\$1,287	\$901	\$386	\$2,574		
HUMBOLDT	\$10,105	\$7,074	\$3,032	\$20,211		
IMPERIAL	\$0	\$0	\$0	\$0		
INYO	\$0	\$0	\$0	\$0		
KERN	\$42,716	\$29,901	\$12,814	\$85,431		
KINGS	\$0	\$0	\$0	\$0		
LAKE	\$0	\$0	\$0	\$0		
LASSEN	\$0	\$0	\$0	\$0		
LOS ANGELES	\$407,605	\$285,324	\$122,277	\$815,206		
MADERA	\$0	\$0	\$0	\$0		
MARIN	\$4,654	\$3,258	\$1,397	\$9,309		
MARIPOSA	\$1,105	\$773	\$331	\$2,209		
MENDOCINO	\$6,647	\$4,653	\$1,994	\$13,294		
MERCED	\$16,931	\$11,852	\$5,079	\$33,862		
MODOC	\$0	\$0	\$0	\$0		
MONO	\$0	\$0	\$0	\$0		
MONTEREY	\$11,833	\$8,283	\$3,550	\$23,666		
NAPA	\$3,040	\$2,128	\$912	\$6,080		
NEVADA	\$0	\$0	\$0	\$0		
ORANGE	\$44,569	\$31,198	\$13,371	\$89,138		
PLACER	\$4,730	\$3,311	\$1,420	\$9,461		
PLUMAS	\$861	\$603	\$258	\$1,722		
RIVERSIDE	\$40,510	\$28,357	\$12,152	\$81,019		
SACRAMENTO	\$52,757	\$36,930	\$15,828	\$105,515		
SAN BENITO	\$1,412	\$988	\$423	\$2,823		
SAN BERNARDINO	\$69,661	\$48,763	\$20,899	\$139,323		
SAN DIEGO	\$56,666	\$39,666	\$17,000	\$113,332		
SAN FRANCISCO	\$50,219	\$35,153	\$15,067	\$100,439		
SAN JOAQUIN	\$27,788	\$19,452	\$8,336	\$55,576		
SAN LUIS OBISPO	\$5,316	\$3,721	\$1,595	\$10,632		
SAN MATEO	\$6,017	\$4,212	\$1,805	\$12,034		
SANTA BARBARA	\$0	\$0	\$0	\$0		
SANTA CLARA	\$29,943	\$20,960	\$8,984	\$59,887		
SANTA CRUZ	\$0	\$0	\$0	\$0		
SHASTA	\$13,377	\$9,364	\$4,013	\$26,754		
SIERRA	\$0	\$0	\$0	\$0		
SISKIYOU	\$2,659	\$1,862	\$798	\$5,319		
SOLANO	\$9,960	\$6,972	\$2,988	\$19,920		
SONOMA	\$8,898	\$6,228	\$2,670	\$17,796		
STANSLAUS	\$17,809	\$12,466	\$5,342	\$35,617		
SUTTER	\$0	\$0	\$0	\$0		
TEHAMA	\$0	\$0	\$0	\$0		
TRINITY	\$297	\$208	\$90	\$595		
TULARE	\$23,382	\$16,367	\$7,015	\$46,764		
TUOLUMNE	\$0	\$0	\$0	\$0		
VENTURA	\$18,371	\$12,859	\$5,511	\$36,741		
YOLO	\$5,828	\$4,080	\$1,749	\$11,657		
YUBA	\$7,333	\$5,133	\$2,200	\$14,666		
TOTAL	\$1,124,286	\$787,000	\$337,285	\$2,248,571		

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INTRODUCTION AND PLANNING REQUIREMENTS

The purpose of this handbook is to specify the format in which each County Welfare Department (CWD) must present the information required in its Food Stamp Employment and Training (FSET) Plan. There is great time pressure for approving County FSET Plans. To expedite the approval process and enable CWDs to implement their Federal Fiscal Year (FY) 1999 programs on October 1, 1998, the County FSET Plans *must* be submitted in this standard format.

County FSET plans are submitted biennially. Therefore, this revised handbook captures information the Department needs to meet federal requirements for FY 99 and FY 00. Additionally, tables for providing FY 00 information are included. However, future legislative action could bring about significant revisions to current food stamp work requirements, necessitating changes in FY 00 FSET County plans.

Plan Requirements

Receipt of a Federal grant for the FSET Program is contingent upon approval of the State FSET Plan by the Food and Nutrition Service (FNS). The sections and subsections in this handbook cover all of the items that must be included in the County FSET Plan. *Numerous changes have been made as a result of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) and the Balanced Budget Act of 1997 (BBA). Please read the handbook carefully before preparing the plan for submission.* For more information, contact Tony Pyara at (916) 657-2630.

Plan Submission Schedule

Plans must be submitted by December 1,1998.

Address for Plan Submission

Send one copy of the County FSET Plan to:

California Department of Social Services

744 P Street, Mail Station 16-33

Sacramento, California 95823

Attention: Tony Pyara

Plan Modifications

If any significant changes are to be made to the FSET program during the year(s) for which a

County FSET Plan applies, the CWD must submit a plan modification to the above address. The

modification request must be approved before the proposed change may be implemented. The

CWD may be liable for costs associated with implementation prior to approval by the State. The

following are examples of changes that would require a formal modification of the County FSET

Plan:

Major change in components (e.g., adding, deleting, or modifying a component);

• Change in the amount of expenditures expected to exceed the 100 percent FSET grant

level for which the CWD will request 50 percent Federal reimbursement;

Change in the method of paying participant reimbursement.

The plan modification must include an explanation of the proposed change(s) as well as a revised

copy of Table 1 (1a), Estimated Participant Levels, and Table 2 (2a), Estimated FSET Placement

Levels if participation levels change as a result of the plan modification. Similarly, a revised copy

of Table 4 (4a), Operating Budget, and Table 5 (5a), Planned Fiscal Year Costs, must be included

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if the plan modification will result in a change in the operating budget and/or a change in the amount of any of the funding categories.

Some changes to the County FSET Plan do not require approval by the State. These changes include the substitution of one contractor for another which does not affect the scope or operation of a component or a change in the targeted population of a component (e.g., from illiterate adults to high school dropouts under 20 years old) which does not affect the participation levels or component cost. Although State approval is not required for these changes, it is imperative that *all* changes to the County FSET Plan be reported to the State in a timely manner so that timely changes to the State plan may be sent to FNS. These changes should be reported in the form of page changes to the appropriate sections of the plan.

PART I SUMMARY OF COUNTY FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM

Part I of the County FSET Plan summarizes the FSET program that the County plans to implement.

In Section I–A provide an outline of the major features of the CWD's FSET program. In Section I–B describe the components that will be included in the program.

- **A. Abstract of the County FSET Program.** Provide a brief narrative that summarizes and affords an overall perspective of the FSET program. The abstract should, at a minimum, include the following information:
- 1. Program Changes. Both the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) and the Balanced Budget Act of 1997 (BBA) contained significant amendments to the Food Stamp Act concerning FSET, participation/work requirements for ABAWDs, and Federal funding requirements. County FSET programs are undergoing drastic changes as Counties design and implement strategies to create qualifying work opportunities for ABAWDs and meet program spending requirements while continuing to provide traditional FSET services to their food stamp work registrant populations. Describe here the nature of the changes proposed in the plan.

- **2. ABAWD Population.** Estimate the size of the ABAWD population to be served by the program. Discuss planned implementation of the 15 percent ABAWD exemption allowance, specifically the categories of ABAWDs to be exempted. Discuss any special problems associated with the ABAWD population, e. g., and anticipated high noncompliance levels, significant barriers faced by ABAWDs, etc.
- **3. Program Components.** By law an FSET program may consist of many different types of components, including but not limited to (see Table 4):
 - independent job search;
 - job search training and support;
 - workfare;
 - educational programs to improve employability;
 - work experience or training to improve employability;
 - other employment oriented activities (e.g., job placement, supported work experience, JTPA services);
 - self–employment training;
 - education and training components in combination with drug/alcohol services provided with non-FSET funds.

List the components that will be included in the FSET program. Discuss the weekly/monthly hours of participation required of each, and describe planned combinations of components to meet the statutory requirement of 20 hours participation per week to qualify as a work program for ABAWDs.

- **4. Sequencing of Components.** If it is intended that persons will be placed in more than one component over the course of the year, describe the sequence in which the components will be assigned.
- **5. Other Employment Programs.** Describe other employment and training programs that serve food stamp/CalWORKs/GA recipients and how the FSET Program will interface with

them. Detail the coordination between the CalWORKs Welfare to Work program and the FSET Program, including administrative consolidations and shared components, if any.

- **6. Workforce Development System.** Describe the CWD's plans for delivering each of its FSET components through its workforce development system. If a particular component is not available locally through the system, discuss the source(s) the County will use to provide it.
- 7. Outcome Data. FNS is interested in receiving any outcome data, such as numbers of participants entering employment, types of employment found, wage rates, etc., collected by Counties. Please forward such data with the FSET County plan. FNS would also like to have a copy of any evaluations or studies relating to employment and training conducted or commissioned by Counties.
- **B. Program Components.** In this part of the plan provide detail on each of the components included in the FSET program.
- **1. Explanation of Terms.** Below are explanations of items that must be included in the component descriptions, as appropriate.
 - *Description of component.* Describe the participant activities of the component.
 - Type of component. Each component must be designated as either a work or non-work component. Work components are limited to workfare, OJT, or work experience. Participation in a work component for a food stamp household in a month is limited to the number of hours obtained by dividing the household's monthly benefit level by the higher of the applicable Federal or State minimum wage. Depending on the amount of the household's monthly food stamp allotment, individuals in work components can be required to work up to 30 hours per week. Any other type of component must be defined as a "non-work component". Individual participation in combined work and non-work components is limited to

a total of 120 hours per month, regardless of household allotment size. Participants in non–work components may be required to participate for up to 120 hours per month regardless of allotment size.

- Geographic areas covered and variations among local areas. Summarize the areas where this particular component will operate (e.g., Countywide).
- Anticipated number of ABAWDs who will begin the component. Those
 nonexempt work registrants subject to the time limit who begin a component.
 ABAWDs will be sanctioned if they fail to comply with the component
 requirements without good cause.
- Anticipated number of mandatory participants who will begin the component.

 Those nonexempt work registrants who begin a component and who will be sanctioned if they fail to comply with the component requirements without good cause.
- Anticipated number of volunteers who will begin the component. Exempt food stamp recipients or ABAWDs subject to the time limit who volunteer for and begin a component. Volunteers are not subject to sanctions for noncompliance.
- Number of participants expected to receive a participant reimbursement and the estimated amount of reimbursements to be paid. Provide realistic estimates of how many individuals are expected to need reimbursement and the amount of money needed. Include separate estimates for 1) transportation and costs other than dependent care, and 2) dependent care costs. Use actual spending for the current operating year as a starting point for future budget projections.

In developing participant reimbursement estimates, use projected participation levels that take into account attrition and noncompliance by persons who are

placed in components. For example, if—based on experience—a CWD expects that 80 percent of 1,000 persons referred to a two–month FSET component will participate, and the County spent an average of \$20 per participant per month in FY 98, a reasonable estimate for transportation and other costs might be \$32,000 (800 persons x \$20/month = \$16,000 x 2 months = \$32,000). In determining dependent care costs, if a CWD expects that 20 percent of the 800 participants will require dependent care services at an average of \$200 per dependent per month for an average of two dependents, a reasonable estimate for dependent care reimbursement would be \$128,000 (160 persons x \$200 x 2 dependents x 2 months = \$128,000).

- Targeted population. What criteria are used to determine who is placed in this component (e.g., ABAWDs, persons who have previously completed other components; non–English speaking persons)? Are applicants as well as participants served?
- Level of participant effort, or number of hours of participation in the component and duration. Specify for each component description the level of effort for participants. FNS offers a level of effort comparable to 12 hours per month per participant for two months as a guideline for a meaningful non-ABAWD component, but CWD's can propose other meaningful participation levels. One way for ABAWDs to remain eligible for food stamps is to participate for 20 hours or more a week in non-work, education/training activities.
- Organizational responsibilities. Specify service providers. Which entity operates
 this component (e.g., County operates individual job search; contractor operates
 vocational training)?
- *Cost of the component per placement.* Compute the estimated cost per placement by adding the anticipated number of placements of both mandatory participants

and volunteers and divide that sum into the estimated total cost of the component, *excluding* participant reimbursement. Do not include the number of persons sent a notice of adverse action.

- Total cost of the component. Provide the estimated combined Federal, State and
 County cost including participant reimbursement, and the estimated combined
 Federal and County cost without participant reimbursement. This cost must be the
 same as specified on Table 4, the Operating Budget (See Part IV).
- **2. Component Summaries.** The following sections outline the information that must be included for each specific component (use additional space when necessary).
 - a. Job Search. Note: job search is not a qualifying ABAWD activity.
 - Name of the component
 - Description of component
 - Type of component
 - Geographic areas covered and variations among local areas
 - Anticipated number of mandatory participants
 - Anticipated number of volunteer participants
 - Number of job contacts that will be required over what time period
 - Targeted population
 - Organizational responsibilities
 - Method for monitoring job contacts (e.g., random phone calls)
 - Per participant cost of participant reimbursement; number of participants
 expected to receive a participant reimbursement; and the estimated amount of
 reimbursements to be paid. Separate dependent care from transportation and
 other costs (see Part IV.C.)
 - Cost of the component per placement, excluding reimbursement

• Total cost of the component, including reimbursement (must equal item 8 for this component on Table 4(4a), the Operating Budget), and excluding reimbursement

b. Job Search Training. Note: job search training is not a qualifying ABAWD activity.

- Name of the component.
- Description of component.
- Type of component.
- Description of component structure (e.g., group training and motivation followed by supervised job club). Describe the duration and goals of the training as well as any specific job search requirements.
- Geographic areas covered and local variations.
- Anticipated number of mandatory participants.
- Anticipated number of volunteers.
- Targeted population.
- Level of participant effort.
- Duration (e.g., 1 week, 30 hours per week, of classroom training, followed by 2 weeks, 10 hours per week, of actual job search).
- Organizational responsibilities.
- Per participant cost of participant reimbursement; number of participants
 expected to receive a participant reimbursement; and the estimated amount of
 reimbursements to be paid. Separate dependent care from transportation and
 other costs (see Part IV.C.).
- Cost of the component per placement, excluding reimbursement.
- Total cost of component, including reimbursement (must equal item 8 for this component on Table 4(4a), the Operating Budget), and excluding reimbursement.

- **c.** Workfare. List only workfare programs operated under 7 CFR 273.7(f)(1)(iii).
 - Name of the component.
 - Description of component. Include in the description whether, following the initial determination of eligibility, newly certified ABAWDs are required to conduct a 30-day job search.
 - Type of component.
 - Geographic areas covered and local variations.
 - Anticipated number of ABAWD participants.
 - Anticipated number of other mandatory participants.
 - Anticipated number of volunteers.
 - Targeted population.
 - Duration.
 - Does participation begin with 30–day job search period for
 - Organizational responsibilities (e.g., ES develops worksites; CWD assigns participants and monitors activity).
 - Per participant cost of participant reimbursement; number of participants
 expected to receive a participant reimbursement; and the estimated amount of
 reimbursements to be paid. Separate dependent care from transportation and
 other costs (see Part IV.C.).
 - Cost of the component per placement—excluding reimbursement.
 - Total cost of component, including reimbursement (must equal item 8 for this component on Table 4(4a), the Operating Budget), and excluding reimbursement.
- d. Comparable (self-initiated) Workfare. List only comparable workfare programs established by a County under section 6(o)(2)(C) of the Food Stamp Act. NOTE: In order to qualify for Federal financial participation, a full description of the comparable workfare program must be included in the County FSET Plan.
 - Name of the component.

- Description of component. Include the method used to determine the monthly number of participation hours.
- Type of component.
- Geographic areas covered and local variations.
- Anticipated number of ABAWDs who will enter the component.
- Organizational responsibilities, if any.
- ABAWD responsibilities (finding workfare position, keeping track of hours of participation, reporting, etc.).
- If applicable, the per participant cost of participant reimbursement; number of
 participants expected to receive a participant reimbursement; and the estimated
 amount of reimbursements to be paid.
- Cost of the component per placement—excluding applicable reimbursements.
- Total cost of component, including applicable reimbursements (must equal item 8 for this component on Table 4(4a), the Operating Budget), and excluding applicable reimbursements.

e. Education

- Name of the component.
- Description of component.
- Type of component.
- Type of education activities (e.g., ESL; GED; basic literacy, ABE, post-secondary education).
- Geographic areas covered and local variations.
- Anticipated number of ABAWD participants.
- Anticipated number of other mandatory participants.
- Anticipated number of volunteers.
- Targeted population.
- Level of participant effort.
- Duration (e.g., 3 hours per week at night over a 4 month period).

- Organizational responsibilities (e.g., CWD refers participants to basic adult education classes and monitors progress).
- Link to employment. Explain how the educational services will be directly related to employability.
- Per participant cost of participant reimbursement; number of participants
 expected to receive a participant reimbursement; and the estimated amount of
 reimbursements to be paid. Separate dependent care from transportation and
 other costs (see Part IV.C.).
- Cost of the component per placement, excluding reimbursement (e.g., ESL \$50 per person; GED \$200 per person).
- Total cost of the component, including reimbursement (must equal item 8 for this component on Table 4(4a), the Operating Budget), and excluding reimbursement.

f. Vocational Training

- Name of the component.
- Description of training program.
- Type of component.
- Geographic areas covered and local variations.
- Anticipated number of ABAWD participants
- Anticipated number of other mandatory participants.
- Anticipated number of volunteers.
- Level of effort.
- Duration (e.g., one to three month course, two to four hours per day).
- Targeted population.
- Organizational responsibilities.
- Per participant cost of participant reimbursement; number of participants
 expected to receive a participant reimbursement; and the estimated amount of

- reimbursements to be paid. Separate dependent care from transportation and other costs (see Part IV.C.).
- Cost of the component per placement, excluding reimbursement.
- Total cost of the component, including reimbursement (must equal item 8 for this component on Table 4(4a), the Operating Budget), and excluding reimbursement.
- g. Combination and Additional Components. Include JTPA programs, programs under section 236 of the Trade Act of 1974 (19 U.S.C. 2296), and other employment and training programs operated or supervised by the County or by a political subdivision of the County. NOTE: In order to qualify for Federal financial participation, a full description of the additional component must be included in the County FSET Plan and it must adhere to statutory limitations on hours of work and/or participation for FSET participants.
 - Name of the component.
 - Description of component.
 - Type of component.
 - Geographic areas covered and local variations.
 - Anticipated number of ABAWD, mandatory, and volunteer participants.
 - Targeted population.
 - Level of participant effort.
 - Duration.
 - Organizational responsibilities.
 - Per participant cost of participant reimbursement; Number of participants
 expected to receive a participant reimbursement; and the estimated amount of
 reimbursements to be paid. Separate dependent care from transportation and
 other costs (see Part IV.C.).
 - Cost of the component per placement, excluding reimbursement.
 - Total cost of the component, including reimbursement (must equal item 8 for this component on Table 4(4a), the Operating Budget), and excluding reimbursement.

Example:

Workfare

- Name of component: Work for Benefits
- Description of component: Work for Benefits is a work component. Following the initial determination of eligibility, newly certified ABAWDs are required to conduct a 30–day job search. Participants attend two days (six hours each) of classroom instruction on job search techniques, including interviewing, telephone technique, preparation for interviewing and good work habits. The next five days are spent in a phone room arranging interviews with prospective employers. Participants must make five documented job contacts a day in the subsequent three weeks, reporting to a case manager every other week. At the end of the 30–day job search period, if the ABAWD has not obtained employment, he/she is offered a workfare slot at a local public or private non–profit agency, such as a government facility or a charitable organization. If the ABAWD accepts the offer, he or she will be required to work total monthly hours equivalent to the number obtained by dividing the household's monthly food stamp allotment by the minimum wage.
- Geographic areas covered: The workfare component will operate in all sections in the County. There is no local variation. The specified activities are provided in a standard fashion throughout the county.
- Anticipated number of work slots to be offered to ABAWDs per month: 1,000.
 Number of anticipated filled work slots per month: 200.
- Anticipated number of other mandatory participants: 0
- Anticipated number of volunteers: 0
- Targeted population: The workfare component will provide work opportunities for ABAWDs.
- Level of participant effort: See above description
- Duration: indefinite.
- Organizational responsibilities: County contracts Employment Services to provide workfare slots.

- Per participant cost of participant reimbursement: \$25 for transportation and other costs for 200 ABAWDs monthly. Total monthly cost of participant reimbursements: \$5,000 (\$25 x 200).
- Cost of the component per placement: N/A
- Total cost of component excluding reimbursement: \$708,000 (\$30 x 800 unfilled slots per month x 12 months = \$288,000. \$175 x 200 filled slots per month x 12 months = \$420,000. \$288,000 + \$420,000 = \$708,000). Total cost including reimbursement: \$768,000.

PART II PROGRAM PARTICIPATION AND EXEMPTIONS

This section of the County FSET Plan contains data the CWD used to design and plan its FSET program. It includes: 1) the number and characteristics of the expected pool of work registrants; 2) an explanation of whether the CWD is able to produce an unduplicated count of work registrants; 3) the estimated number of work registrants the CWD intends to exempt from FSET, along with a discussion of the proposed exemption criteria, and 4) the anticipated number of placements into FSET components. Additionally, this section now includes: 1) the number of ABAWDs anticipated in the County during the fiscal year; 2) the estimated number of ABAWDs in waived areas of the County; 3) the estimated average monthly number of ABAWDs included in the County's 15 percent exemption allowance, along with a discussion of how the County intends to apply the exemption (e.g., categorically, on a case—by—case basis, etc.); and 4) the number of ABAWDs the CWD anticipates serving in qualifying education/training and/or workfare activities.

In this section, provide a clear explanation of the methods used to estimate the number of work registrants and ABAWDs, and the potential number of FSET placements, including ABAWDs. Use actual figures from the current fiscal year whenever possible in formulating the projection. Be as accurate as possible in developing these estimates.

A. Work Registrant Population.

- 1. Number of Work Registrants. Include the following work registrant data as you report on the STAT 40:
 - a. The number of work registrants expected to be in the County as of October 31,
 1998 of the fiscal year.
 - b. The anticipated number of new work registrants to be added between November 1, 1998 and September 30, 1999 of the fiscal year.
 - c. The total number of work registrants in the County between October 1, 1998 and September 30, 1999 of the fiscal year (a + b = c).

- 2. Characteristics of Work Registrants. One part of the planning process is a careful analysis of the characteristics of the work registrant population and the potential FSET caseload. This type of analysis is helpful in determining the scale of program that is anticipated, as well as for deciding what types of services/components to provide. In addition, these data could be used to justify exemption criteria. If such analysis has been done, include a summary of the characteristics of the work registrant population in this section of the plan. The data should reflect the type of analysis used by the CWD to determine the composition of the FSET program chosen by the CWD. The summary should note how the data were compiled (e.g., special survey; Food Stamp FSET Program data; analysis of the Quality Control data; agency automated client record or certification system).
- **B.** Number of Work Registrants Exempt from the FSET Program. Indicate the percentage and number of the CWD's total work registrant population that are expected to be in the categorical and individual exemption categories. Use the format in **Table 1**, **Estimated Participant Levels**. Use Table 1 for FY 1999 and Table 1A for FY 2000 estimates.
- C. Planned FSET Program Participation. Indicate the estimated number (including ABAWDs) of mandatory work registrants and volunteers that the CWD expects to begin a component. Use the format in Table 2, Estimated FSET Placement Levels. Use Table 2 for FY 1999 and Table 2A for FY 2000 estimates. Note that Table 2 reflects a count of placements *not* participants. A participant may begin and participate in more than one component over the course of the year. Each time the participant begins a new component the CWD counts a placement. However, if participation in a single component is not continuous (e.g., participation is interrupted by a disqualification), count the participant as placed only at the time of initial commencement of the component.
- **D. ABAWD Information.** On Tables 1 and 1A include the CWD's estimate of: 1) the number of ABAWDs expected to be in the County during the fiscal year; 2) the number of ABAWDs expected to be in waived areas of the County during the fiscal year; and 3) the average monthly number of ABAWDs included in the CWD's 15 percent ABAWD exemption allowance.

Since there are no current waivers, the estimate for Tables 2 and 2A will be zero for waived areas of the county. Please include an estimate of: 1) the number of workfare opportunities it will create for ABAWDs, broken down by "offered" or "filled" status; and 2) the number of qualifying education and training opportunities it will create for ABAWDs, again broken down by "offered" or "filled" status.

TABLE 1

ESTIMATED PARTICIPANT LEVELS FISCAL YEAR 1999

A.	Total number of work registrants in the County during the planned Federal Fiscal Year.	
В.	List exemptions and the number of work registrants categorically exempt from FSET participation.	
	1. Geographic	
	2. Substitute Program	
	Total	
C.	List deferrals and the number of work registrants individually deferred from FSET participation.	
	1. Temporary illness	
	2. Lack of child care	
	3. Lack of transportation to/or lining too far from	
	FSET program	
	4. Family difficulties	
	5. Legal difficulties	
	6. Temporarily unemployed, expected to return	
	to work with in 60 days	
	Total	
D.	Total number of work registrants exempt/deferred from FSET (B+C)	
E.	Percent of all work registrants exempt/deferred from FSET (D/A)	
F.	Number of FSET mandatory participants (A-D)	
G.	Total number of ABAWDs in the County during the planned Federal Fiscal Year.	
Н.	Total number of ABAWDs in waived areas of the County during the planned Federal fiscal year.	
I.	Average monthly number of ABAWDs exempted under the County's	

TABLE 1A

ESTIMATED PARTICIPANT LEVELS FISCAL YEAR 2000

Α.	Total number of work registrants in the County during the planned Federal Fiscal Year.	
В.	List exemptions and the number of work registrants categorically exempt from FSET participation.	
	1. Geographic	
	2. Substitute Program	
	Total	
C.	List deferrals and the number of work registrants individually deferred from FSET participation.	
	1. Temporary illness	
	2. Lack of child care	
	3. Lack of transportation to/or lining too far from	
	FSET program	
	4. Family difficulties	
	5. Legal difficulties	
	6. Temporarily unemployed, expected to return	
	to work with in 60 days	
D.	Total number of work registrants exempt from FSET (B+C)	
E.	Percent of all work registrants exempt from FSET (D/A)	
F.	Number of FSET mandatory participants (A–D)	
G.	Total number of ABAWDs in the County during the planned Federal Fiscal Year.	
Н.	Total number of ABAWDs in waived areas of the County during the planned Federal fiscal year.	
I.	Average monthly number of ABAWDs exempted under the County's 15 percent ABAWD exemption allowance.	

TABLE 2

ESTIMATED FSET PLACEMENT LEVELS FISCAL YEAR 1999

1.	Number of times mandatory participants are expected to begin a component.	
2.	Number of times volunteer participants are expected to begin a component.	
3.	Total number of placements the CWD expects to make during the year.	
	ESTIMATED ABAWD ACTIVITY FISCAL YEAR 1999	
1.	Number of workfare slots expected to be created in unwaived areas of the County. a. Offered slots b. Filled slots	
2.	Number of workfare slots expected to be created in waived areas of the County. a. Offered slots b. Filled slots	
3.	Number of education and training slots expected to be created in unwaived areas of the County. a. Offered slots b. Filled slots	
4.	Number of education and training slots expected to be created in waived areas of the County. a. Offered slots b. Filled slots	
5.	Number of ABAWD slots the CWD expects to create during the year. Offered slots (1a + 2a+3a+4a) Filled slots (1b + 2b=3b+4b) Total	

TABLE 2A

ESTIMATED FSET PLACEMENT LEVELS FISCAL YEAR 2000

1.	Number of times mandatory participants are expected to begin a component.	
2.	Number of times volunteer participants are expected to begin a component.	
3.	Total number of placements the CWD expects to make during the year.	
	ESTIMATED ABAWD ACTIVITY FISCAL YEAR 2000	
1.	Number of workfare slots expected to be created in unwaived areas of the County. a. Offered slots b. Filled slots	
2.	Number of workfare slots expected to be created in waived areas of the County. a. Offered slots b. Filled slots	
3.	Number of education and training slots expected to be created in unwaived areas of the County. a. Offered slots b. Filled slots	
4.	Number of education and training slots expected to be created in waived areas of the County. a. Offered slots b. Filled slots	
5.	Number of ABAWD slots the CWD expects to create during the year. Offered slots (1a + 2a+3a+4a) Filled slots (1b + 2b=3b+4b) Total	

PART III PROGRAM COORDINATION

In Part III of the County FSET Plan, describe coordination within the County Food Stamp Program as well as interagency coordination between the County Food Stamp Program and other agencies within the CWD and/or other agencies and entities outside the CWD.

- **A. Program Coordination.** Clearly describe how the FSET program relates to other processes in the Food Stamp Program.
- 1. Narrative Coordination Statement. Include an organization chart and a client flow chart. Describe the linkages between the following food stamp functions and the FSET program:
 - intake, application, and recertification;
 - work registration;
 - screening for FSET participation;
 - FSET component assignment;
 - monitoring compliance with component requirements;
 - determination of good cause;
 - preparation of the Notice of Adverse Action;
 - sanctioning resulting from noncompliance with the FSET program requirements.
- **2. Information Coordination.** Briefly describe how information will be coordinated and exchanged (e.g., forms, computer linkages, documentation of participant status and actions taken). Note actions taken by the CWD level during the planning process to improve coordination and information flow between the FSET program and other agency units.

Describe the intake and sanction systems described here. It is particularly important to describe the procedures established to assure that appropriate sanction actions are begun within the time frames established by the Food Stamp Program regulations at Manual of Policy and Procedures 63-407.5 after learning of an mandatory participant's noncompliance with FSET requirements. If the CWD wishes to use intake or other systems which are compatible with its CalWORKs work program, describe the proposed systems in this section of the County FSET Plan.

- **3.** Coordination Time Frames. Describe time frames associated with the FSET program and the major Food Stamp Program functions (e.g., how much time elapses between application for food stamps and referral into the FSET program, and between a finding of noncompliance and initiation of a Notice of Adverse Action).
- **B.** Interagency Coordination. An important aspect of the FSET program is that it should be coordinated as closely as possible with other relevant programs and agencies to maximize the use of all resources to assist food stamp applicants and recipients in improving their employability and self–sufficiency. In this section of the County FSET Plan describe the linkages between the FSET program and other programs using the format presented in **Table 3**, **Summary of Interagency** Coordination. Table 3 is summarized here:
- 1. Areas of Coordination. Agencies or programs with which FSET may have linkages include:
 - Employment Service (ES)
 - Board of Education
 - Vocational Education Agency
 - Social Services Agency
 - CalWORKs work programs
 - JTPA
 - General Assistance Work Program
 - Other agencies or programs as appropriate

Items for which CWD's should describe linkages include:

• Another agency delivers services in an FSET component.

- The CWD delivers services for another program or agency (e.g., the CWD has a contract to provide job search training to JTPA clients).
- The FSET program and another program or agency jointly operate one or more components (e.g., integrated Job Clubs).
- The FSET program refers individuals to another agency or program for services (e.g., referral to public adult education classes for remedial education).
- Specify other areas of coordination as appropriate.

2. Methods of Coordination.

- Non–financial interagency agreements.
- Contract for provision of services.
- Joint plans of operation (e.g., the FSET Program and CalWORKs work program prepare one integrated operations plan or manual).
- Informal referral procedures (e.g., the FSET Program refers participants to JTPA or the ES according to the regular intake policies for those programs, with no special arrangements for FSET participants).
- Specify other methods of coordination as appropriate (e.g., joint advisory committees; joint staff training; exchange of job orders or Job Bank).
- **C.** Contractual Arrangements. If the CWD anticipates contracting out any portions of the FSET program, specify the activities to be delegated to the contractor(s) (e.g., assessment, provision of FSET services). Specific information on the contractual arrangements does not have to be included in the County FSET plan. However, this information must be maintained by the CWD and be available for review by CDSS or FNS upon request. Such information includes:
 - Name and location of the contractor.
 - Amount of the contract.
 - The contract management approach (e.g., performance based contract).
 - The basis for charging for contractual services (i.e., will actual costs be claimed or a certain amount per activity?).

- Number of persons expected to be placed through the contract.
- Whether the contract was competitively awarded or sole sourced (i.e., not bid, but negotiated).
- The method for monitoring the performance of the contractor, and the results of such monitoring.

TABLE 3

SUMMARY OF INTERAGENCY COORDINATION FOR THE FSET PROGRAM

	Methods of Coordination Areas of Coordination	Agencies	Number of	
SE I		(List all that are involved)	Placements Expected	
	Delivers an FSET component			
	The FSET program delivers a service for another agency or program			
	Joint component of the FSET program and another agency or program			
	Referral of individuals from the FSET program to another program or agency			
	Other forms of coordination			
	(Specify)			

PART IV PROGRAM COSTS AND FINANCIAL MANAGEMENT

Address the costs of the FSET program and related financial issues in Part IV of the County FSET Plan.

A. Planned Costs of the County FSET Program.

FSET programs are a joint responsibility of the State and County governments. The integrity of FSET programs depend on how the CWD's manage and operate them. It is vital that budget estimates be realistic and based on past experience and concrete projections. CWD's should use actual spending for the current operating year as a starting point for future budget projections, not the levels projected in previous County FSET plans.

The information provided in the following subsections of the County FSET Plan must identify the planned allocation of CWD funds on **Table 4**, **Operating Budget**, and indicate the source of the funding on **Table 5**, **Planned Fiscal Year Costs**.

Exhibit 1, **FSET Program Financial Participation Categories**, depicts and explains the three FSET funding categories, including the two types of participant reimbursement.

1. Operating Budget. Separate operating expenses by component on Table 4, Operating Budget, which also captures administrative expenditures not associated with one particular component, but with overall operation of the CWD's FSET program. Use Table 4 for FY 1999 and Table 4A for FY 2000 estimated operating expenses.

Table 4 captures the minimum amount of cost information acceptable for approval of a County FSET Plan. *The table must be accompanied by a narrative description of all items.* Please provide as much detail as possible. Additional information may be requested by CDSS if this section does not contain a complete description of Table 4. If any costs are shown as "Overall

CWD FSET Operational Costs" are not attributable to specific components, a complete explanation and justification of these costs must be included. CDSS must receive assurance that these costs do not represent any service to persons not receiving food stamps.

If the CWD plans to provide or *arrange for dependent care services* in lieu of providing participant reimbursements, this should be noted here and discussed further in Part IV.C. Costs are allowed only with prior approval of CDSS and must be adequately documented to ensure that they are necessary, reasonable and properly allocated to the Food Stamp FSET Program.

- 2. Sources of FSET Funds. Estimate the total cost of the County FSET program and identify the source of funds, according to the funding categories. A format for providing this cost information is presented in Table 5, Planned Fiscal Year Costs.
- **3.** Use of Funds. Acknowledge that the CWD will allocate at least 80 percent of its total 100 percent Federal FSET grant expenditure to provide opportunities for ABAWDs to participate in an approved work or workfare program.
- **4. Maintenance of Effort (MOE).** Indicate, if applicable, whether the CWD intends to spend at least as much as it spent of its own funds in FY 96 for FSET and optional workfare administration to receive the additional 100 percent Federal allocations provided for in the Balanced Budget Act of 1997. County spending for participant reimbursements and dependent care reimbursements *do not count* towards meeting the CWD's maintenance of effort requirement.
- 5. Justification of Education Costs. The Hunger Prevention Act of 1988 prohibits CWD's from supplanting County education costs from the County to the Federal government. Provide an assurance that such supplantation has not and will not occur. CWD's must explain the basis for any charges to the Federal government for educational costs. This explanation must include a discussion of why such costs are attributed to the FSET program and cannot be met

through other existing education programs. Address whether the services being provided are available to persons other than FSET participants and if so, what the cost is for those persons.

B. Contracts. The amount spent on contractual obligations is captured on Table 4. The elements that comprise the total cost of the contract must be maintained as part of the CWD's records. Clarification of the contractual costs reported on Table 4 may be requested by the State or FNS, if questionable.

If the CWD plans to use interagency agreements involving a transfer of funds to another agency of the County government, address the basis of charges for food stamp participants and the method for monitoring the agreement.

C. Participant Reimbursement. The CWD is responsible for reimbursing participants for expenses incurred in fulfilling FSET requirements. Expenditures that may be included in this category are transportation, dependent care, books or training manuals, uniforms or other special equipment that a participant must have for participation, and any other necessary and reasonable cost that a participant incurs. Participant expenses for transportation and costs *other than dependent care* are reimbursed by the CWD up to \$25 per participant per month with 50 percent Federal, 35 percent State and 15 percent county cost sharing (the Federal share shall not exceed \$12.50 per participant per month). Expenditures for dependent care—per dependent per month—are reimbursed by the CWD, with 50 percent Federal, 35 percent State and 15 percent county cost sharing, up to the actual cost of the dependent care, the regional market rate, whichever is lower. The CWD may provide reimbursements above \$25 and above established dependent care limits, respectively, but Federal cost sharing is limited to the amounts and limits specified above. Reimbursements may not be paid for with 100 percent grant or 50 percent matched administrative cost funding.

- 1. Method of Reimbursement. If the CWD wants to provide allowances to participants for transportation and costs other than dependent care based on the average costs of participating in FSET, this section of the County FSET Plan must also include an explanation of the method that will be used to determine average expenditures, up to \$25 per participant per month or such higher amount as the CWD elects to provide (Federal cost-sharing will be limited to 50 percent of \$25 for transportation and other costs). If the allowance is set below \$25 per month, participants must be given the option of claiming actual expenses up to \$25 if their costs exceed the allowance.
- **D.** Cost Allocation. Describe the basis for allocating costs if the FSET Program is being administered in conjunction with other employment programs serving recipients of other forms of assistance. Summarize how shared costs will be allocated among the pertinent programs.

EXHIBIT 1

FSET PROGRAM FEDERAL/COUNTY FINANCIAL PARTICIPATION CATEGORIES

ACTIVITIES

FINANCIAL PARTICIPATION

FSET administrative costs under Section 16; including workfare if it is part of the FSET Plan.

100% Federal funding

FSET administrative costs which exceed the 100% unmatched Federal funding.

50% Federal and 50% County funding

Participant reimbursement for expenses incurred in order to participate in the FSET program.

50% Federal, 35% State and 15% County up to a total of \$25 per month per participant for transportation and other costs (i.e., Federal reimbursement limited to \$12.50) and up to the actual cost of the dependent care, the local market rate, or the Statewide limit, whichever is lowest, per month per dependent for dependent care costs (i.e., Federal reimbursement limited to 50% of the established limit). Expenses above these amounts per month do not receive Federal reimbursement.

Directions for Completing Table 4(4A), Operating Budget (see Exhibit 2):

- (1) The name of the component.
- (2) All CWD salary and benefit costs related to each component. Do not include contractor salary and benefit costs here. A contractor is any public or private entity that is providing FSET services under a financial or non–financial agreement with the CWD.
- (3) All other overhead costs to the CWD for each component. Do not include contractor overhead costs here.
- (4) Approximate amount to be paid to each contractor for each component.
- (5) Total dependent care reimbursement cost for each component. (Should match amount shown in Part I of component descriptions.)
- (6) Total participant reimbursement cost for transportation and other costs, excluding dependent care. (Should match amount shown in Part I of component descriptions.)
- (7) The cost to the CWD to provide dependent care services in lieu of participant reimbursements.
- (8) The total of (2) + (3) + (4) + (5) + (6) and (7) *for each component*. These amounts should match costs identified in Part I.B.1 for the total cost of each component, including participant reimbursements.
- (9) The *combined total* of item (8) for each component listed. This amount should equal the total component costs from all components including participant reimbursements.
- (10) Enter the overall CWD FSET operational costs not included under (2), (3), or (4) that are *not associated with a particular component*. This may include costs for assessing mandatory participants prior to assignment to a particular component or CWD staff devoted to oversight of the Program.
- (11) The total of (9) + (10). This amount should equal Line 4 of Table 5(5A), Planned Fiscal Year Costs.

EXHIBIT 2

TABLE 4 OPERATING BUDGET FISCAL YEAR ——— SAMPLE

Contractual

Participant Reimbursement

CWD Cost

Total

CWD Costs

Components

•				(County plus Federal)		for Dependent	
	Salary & Benefits	Other Costs		Dependent Care		Care Services	
					Tansportation	n	
(1) First Component	(2)	(3)	(4)	(5)	(6)	(7)	(8)
(1) Second Component	(2)	(3)	(4)	(5)	(6)	(7)	(8)
(1) Third Component	(2)	(3)	(4)	(5)	(6)	(7)	(8)
(1) Fourth Component	(2)	(3)	(4)	(5)	(6)	(7)	(8)
(1) Fifth Component	(2)	(3)	(4)	(5)	(6)	(7)	(8)
					Total Com	nponent Costs	(9)
				Overall (CWD FSET Oper	rational Costs	(10)
					Total Count	y FSET Costs	(11)

TABLE 4 Operating Budget Federal Fiscal Year 1999

COMPONENT	SALARY & BENEFITS	OTHER COSTS (OVERHEAD)	CONTRACT COSTS	DEPENDENT CARE COSTS	TRANS/ ANCILLARY	TOTAL
Job Search	\$	\$	\$	\$	\$	\$
Job Club						
Workfare						
Workfare SIP						
Supervised Job Search						
Vocational Training						
Vocational Training/Drug Rehabilitation						
Vocational Training/Alcohol Rehabilitation						
Vocational Training/Job Search						
Vocational Training/Job Club						
OJT						
OJT/Drug Rehabilitation						
OJT/Alcohol Rehabilitation						
Education						
Education/Drug Rehabilitation						
Education/Alcohol Rehabilitation						
Education/Job Search						
Education/Job Club						
Other (Describe)						
Total	\$	\$	\$	\$	\$	\$

Total Component	\$
Assessment	\$
Child Care	\$
Transportation/Ancillary	\$
Federal MOE *	\$
State MOE *	\$
County MOE *	\$
Grand Total	\$

^{*} Counted in Total Component Cost tp/disk8/99table4.doc

TABLE 4a OPERATING BUDGET FEDERAL FISCAL YEAR 2000

COMPONENT	SALARY & BENEFITS	OTHER COSTS (OVERHEAD)	CONTRACT COSTS	DEPENDENT CARE COSTS	TRANS/ ANCILLARY	TOTAL
Job Search	\$	\$	\$	\$	\$	\$
Job Club						
Workfare						
Workfare SIP						
Supervised Job Search						
Vocational						
Training						
Vocational						
Training/Drug						
Rehabilitation						
Vocational						
Training/Alcohol						
Rehabilitation						
Vocational						
Training/Job						
Search						
Vocational						
Training/Job Club						
OJT						
OJT/Drug						
Rehabilitation						
OJT/Alcohol						
Rehabilitation						
Education						
Education/Drug						
Rehabilitation						
Education/Alcohol						
Rehabilitation						
Education/Job						
Search						
Education/Job Club						
Other (Describe)						
Total	\$	\$	\$	\$	\$	\$

Total Component	\$
Assessment	\$
Child Care	\$
Transportation/Ancillary	\$
Federal MOE *	\$
State MOE *	\$
County MOE *	\$
Grand Total	\$

^{*} Counted in Total Component Cost tp/disk8/99table4a.doc

TABLE 5

Planned Federal Fiscal Year Costs of the County FSET Program by Category of Funding FFY 1999

Categories	Estimate of FFY 2000 Expenditures	Estimate of FFY 1999
1. E&T Grant Funds (100% Federal)		
2. County Overmatch for Administrative Cost 50% Federal 50% County		
3. Federal Maintenance of Effort		
4. State Maintenance of Effort		
5. County Maintenance of Effort		
6. a. Up to \$25 per month for transportation and other costs:		
50% Federal 35% State 15% County		
b. Up to \$200 per dependent per month for dependent care cost:		
50% Federal 35% State 15% County		
c. County Overmatch for Transportation		
50% Federal 50% County		
d. County Overmatch for Dependent Care		
50% Federal 50% County		
Total E&T Program Costs (1+2+3+4+5+6)		

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TABLE 5A

Planned Federal Fiscal Year Costs of the County FSET Program by Category of Funding FFY 2000

Categories	Estimate of FFY 1999 Expenditures	Estimate of FFY 2000
1. E&T Grant Funds (100% Federal)		
2. County Overmatch for Administrative Cost 50% Federal 50% County		
3. Federal Maintenance of Effort		
4. State Maintenance of Effort		
5. County Maintenance of Effort		
6. a. Up to \$25 per month for transportation and other costs:		
50% Federal 35% State 15% County		
b. Up to \$200 per dependent per month for dependent care cost:		
50% Federal 35% State 15% County		
c. County Overmatch for Transportation		
50% Federal 50% County		
d. County Overmatch for Dependent Care		
50% Federal 50% County		
Total E&T Program Costs (1+2+3+4+5+6)		

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PART V DEFINITIONS

ABAWD. Able—bodied adult without dependents. An individual whose eligibility for food stamps is limited to any three months in a 36—month period during which the individual does not work 20 hours or more a week, averaged monthly; participate in and comply with a qualifying work program for 20 or more hours per week; or participate in and comply with a workfare or comparable program. This limitation **does not apply** to individuals who are: 1) under 18 or over 50 years of age; 2) medically certified as physically or mentally unfit for employment; 3) parents or other members of households with responsibility for a dependent child; 4) exempt from work registration; or 5) pregnant.

Applicant. An individual, a member of a household or a representative of a household who applies in writing for food stamp benefits.

Assessment. An in-depth evaluation of employability skills often coupled with counseling on how and where to search for employment. If combined with work experience, some form of employment search or training, an assessment of this nature could constitute part of an approvable employment and training component.

Commencing a Component. When an FSET participant formally begins participation in a component by performing the first act required by the component, e.g., attending the first Job Club session or making the first job contact. An ABAWD's commencement of a qualifying component must be verified through appropriate documentation or other agency records before credit for a filled slot may be counted.

Component. A service, activity or program, as described in MPP 63-407.4, designed to help food stamp recipients gain skills, training or work experience that will increase their ability to obtain regular employment and achieve self–sufficiency. Components are designated either as "work" or "non–work." Workfare, on–the–job training (OJT), and work experience components are work components. Households containing FSET work component participants are limited to working the number of

hours in a month determined by dividing the household's monthly food stamp allotment by the higher of the applicable Federal or State minimum wage. Depending on the amount of the monthly food stamp allotment, individual work component participants can be required to work up to 30 hours per week and the individual's total hours of participation in both work and non—work components is limited to 120 hours per month.

An FSET program may contain one or more of the following components:

- **1. Job Search** A component that requires participants to make a pre–determined number of inquiries to prospective employers over a specified period of time. The component may be designed so that the participant conducts his/her job search independently or within a group setting. Job search components should entail approximately 12 contacts with employers per month for two months. **Note:** As amended, a job search component does not qualify as a "work program" for the purpose of maintaining food stamp eligibility for ABAWDs.
- 2. Job Search Training A component that strives to enhance the job readiness of participants by providing instruction in job seeking techniques and increase motivation and self—confidence. The component may consist of job skills assessments, job finding clubs, job placement services or other direct training or support activities. The job search training component may combine job search activities with other training and support activities. Note: A job search training component does not qualify as a "work program" for the purpose of maintaining food stamp eligibility for ABAWDs.
- **3. Workfare** A work component in which food stamp recipients perform work in a public service capacity as a condition of eligibility. In lieu of wages, workfare participants receive compensation in the form of their household's monthly coupon allotment. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value to the community.

- **4. Self–Initiated Workfare** A work component, comparable to regular workfare, designed to assist ABAWDs in fulfilling their work requirement. In self–initiated programs, ABAWDs find their own workfare job assignments. They are responsible for arranging to have their participation reported to their caseworkers, and for verifying their workfare hours.
- **5. Vocational Training** A component that improves the employability of participants by providing training in a skill or trade allowing the participant to move directly into employment.
- **6. Education** —A component that provides educational programs or activities to improve basic skills or otherwise improve employability. Such programs include Adult Basic Education (ABE), basic literacy, English as a Second Language (ESL), high school equivalency (GED), and post–secondary education. A post secondary education component is one whose purpose is academic and whose curriculum is designed primarily for students who are beyond the compulsory age for high school. Only educational components that establish a direct link to job–readiness will be approved. Federal FSET funds cannot take the place of nonfederal (i.e., County, local) funds for existing educational services. Federal financial participation for operating education components may be authorized only for costs that exceed the normal cost of services provided to persons not participating in FSET.
- **7. Self–Employment Training** A component that improves the employability of participants by providing training in setting up and operating a small business or other self–employment venture.
- **8. JTPA** Job–training services developed, managed, and administered by County and local governments and the business community under the Job Training Partnership Act. Activities include basic skills training (GED, literacy), occupational skills training, on–the–job training, work experience, job search assistance, and basic readjustment services.

Component Costs (Slot rates). Amounts that represent the maximum 100 percent Federal FSET funds CWD can spend to create qualifying employment and training opportunities and workfare assignments,

i.e., "work slots," for ABAWDs to maintain their eligibility for food stamps. The provision at section 16(h)(1)(G) of the Act authorizes the Secretary of Agriculture to monitor CWD spending and to determine the reimbursable costs of work slots. The Food and Nutrition Service (CDSS) established a maximum reimbursement (slot rate) of \$30 for an offered work slot and \$175 for a filled work slot (see below for definitions of "offered" and "filled" work slots).

FSET Program. A program operated by each County Food Stamp agency consisting of one or more work, training, education or job search components.

FSET Mandatory Participant. A Food Stamp Program applicant or participant required to work register under MPP 63-407.1 and not exempted by the CWD from participation in an employment and training program. A mandatory participant is not necessarily actively participating in an FSET component.

Exempted. This term refers to a work registered person or persons excused by the CWD from mandatory participation in an employment and training program. **Note:** individuals who are exempted from mandatory participation can still participate as volunteers, but are not subject to sanction for failure to comply with program requirements. See definition of "volunteer" below.

"Filled" Work Slot. A filled work slot is a bona fide education, training, or workfare opportunity to which an ABAWD reports and begins his or her activity.

Maintenance of Effort Requirement. The provision at section 16(h)(1)(F) of the Food Stamp Act that requires CWD to maintain at least their FY 96 levels of County spending (if any) for FSET and optional workfare administration to receive the additional 100 percent Federal allocations provided for in the Balanced Budget Act of 1997. County spending for participant reimbursements and dependent care reimbursements are not included in a CWD's maintenance of effort requirement.

Newly Work Registered. Food stamp participants work registered at the point of application or those registered for the first time in their current period of participation.

"Offered" Work Slot. An offered work slot is a bona fide education, training, or workfare opportunity made available to an ABAWD. A slot is offered when the ABAWD is told to report to a specific work site or training facility at a given date and time but the ABAWD either refuses the assignment or does not report.

Screening. An evaluation by the eligibility worker as to whether a person should or should not be referred for participation in an FSET program. This activity is not an approvable FSET component.

Volunteer. A food stamp recipient who is: 1) statutorily exempt from work registration requirements; 2) exempted by the CWD from FSET participation; or 3) not exempted and has complied with, or is complying with, program requirements. CWD may, to the extent they choose, permit volunteers to participate in an FSET component. Volunteers are not subject to sanction for failure to comply with FSET requirements. The hours of participation or work required of Volunteers may not exceed the hours required of mandatory FSET participants.

Work Program. A program under the Job Training Partnership Act (JTPA); a program under section 236 of the Trade Act of 1974; or a program of employment and training, including the FSET Program, operated or supervised by a County or a political subdivision of a County that meets standards approved by the Governor, other than a job search or job search training program. To qualify for Federal financial participation, a work program must be included in the County FSET Plan and it must adhere to statutory limitations on hours of work and/or participation for FSET participants.

Work Registrant. A Food Stamp Program participant subject the provisions of section 6(d)(1) of the Act.

Work Requirement. The provision at section 6(o)(2) of the Act that limits participation in the Food Stamp Program to any three months in a 36–month period during which an otherwise nonexempt ABAWD does not work 20 or more hours a week, averaged monthly; participate in and comply with

the requirements of a work program for 20 or more hours a week; or participate in and comply with the requirements of a workfare program under section 20 of the Act or a self-initiated workfare program. The work requirement does not apply to ABAWDs who reside in areas of a County granted a waiver of section 6(o)(2) by the Secretary of Agriculture due to high unemployment or the lack of a sufficient number of jobs to provide employment. The work requirement does not apply to ABAWDs who are included in each County's 15 percent exemption allowance.

MANAGEMENT INFORMATION AND PROGRAM REPORTING

A. Methods for Meeting On-Going Reporting Requirements.

The County will submit quarterly reports (STAT 40) to the California Department of Social Services the 15th working day of the month following the report quarter.

1. Management Information System (MIS)

[]	Other:	

- B. Organizational Responsibility for FSET Reporting (STAT 40)
 - 1. Responsibility for non-Financial FSET Program. Please provide the name, address and telephone number of contact person:

2. Responsibility for financial FSET reporting (claims). Please provide the name, address and telephone number of contact person: